

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

REBECCA FRANCESCATI,)	
)	
)	
)	
Plaintiff,)	No. 1:11-cv-05270
)	
v.)	
)	Honorable Blanche M. Manning
STEFANI JOANNE GERMANOTTA)	Magistrate Judge Jeffrey T. Gilbert
p/k/a LADY GAGA, INTERSCOPE RECORDS,)	
UNIVERSAL MUSIC GROUP, INC.,)	ECF CASE
DJ WHITE SHADOW, LLC, and)	
BRIAN JOSEPH GAYNOR,)	JURY TRIAL DEMANDED
)	
Defendant.)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Tuesday, October 30, 2012, at 9:15 a.m. or as soon thereafter as counsel may be heard, we shall appear before the Magistrate Judge Jeffrey T. Gilbert, in Courtroom 1386, 219 South Dearborn Street, the courtroom usually occupied by him, and shall then and there present the Joint Motion For An Extension Of The Time To Complete Liability Expert Depositions.

Dated: October 25, 2012

<p><u>/s/Christopher W. Niro</u></p> <p>William L. Niro Christopher W. Niro NIRO, HALLER & NIRO 181 W. Madison, Suite 4600 Chicago, IL 60602 Tel: (312) 236-0733 wniro@nshn.com cniro@nshn.com Attorneys for Plaintiff, Rebecca Francescatti</p>	<p><u>/s/Catherine J. Spector</u></p> <p>Charles Ortner Sandra A. Crawshaw-Sparks PROSKAUER ROSE LLP Eleven Times Square New York, NY 10036 Tel: (212) 969-3000 cortner@proskauer.com scrawshaw@proskauer.com</p> <p>Steven R. Gilford Catherine J. Spector PROSKAUER ROSE LLP 70 West Madison St., Suite 3800 Chicago, IL 60602 Tel: (312) 962-3550 sgilford@proskauer.com cspector@proskauer.com Attorneys for Stefani Joanne Germanotta</p>
<p><u>/s/Elvis D. Gonzalez</u></p> <p>Elvis D. Gonzalez ELVIS GONZALEZ, LTD. Three First National Plaza 70 West Madison St., Suite 1515 Chicago, IL 60602 Tel: (312) 558-9779 egonzalez@elvisgonzalezltd.com Attorney for DJ White Shadow, LLC</p>	<p><u>/s/Bryan E. Curry</u></p> <p>John J. Bullaro, Jr. Bryan E. Curry BULLARO & CARTON PC 200 North LaSalle St., Suite 2420 Chicago, IL 60601 Tel: (312) 831-1000 jbullaro@bullarocarton.com bcurry@bullarocarton.com Attorneys for Brian Joseph Gaynor</p>

<p><u>/s/Andrew H. Bart</u></p> <p>Christopher B. Lay JENNER & BLOCK LLP 353 N. Clark Street Chicago, IL 60654 Tel: (312) 840-7295 clay@jenner.com</p> <p>Andrew H. Bart JENNER & BLOCK LLP 919 Third Avenue – 37th Floor New York, NY 10022-3908 Tel: (212) 891-1600 abart@jenner.com <i>Attorneys for UMG Recordings, Inc.</i></p>	
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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing document via the Court's CM/ECF system on this 25th day of October, 2012.

/s/ Catherine J. Spector

Catherine J. Spector